

Proceeding: INQUIRY CONCERNING THE DEPLOYMENT OF ADVANCED TELECOMMUNICATIONS ☒ Record 1 of 1  
Applicant Name: CAPABILITY TO ALL AMERICANS IN A REASONABLE AND TIMELY FASHI  
Universal Service Alliance

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.**

In the Matter of	)	
	)	
Inquiry Concerning the Deployment of	)	
Advanced Telecommunications	)	CC Docket 98-146
Capability to All Americans in a Reasonable	)	
And Timely Fashion, and Possible Steps to	)	
Accelerate Such Deployment Pursuant to	)	
Section 706 of the Telecommunications	)	
Act of 1996	)	
<hr/>	)	

**Opening Comments of Universal Service Alliance**

Universal Service Alliance (USA)<sup>1</sup> commends the Federal  
Communications Commission (Commission) for initiating this proceeding to

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<sup>1</sup> The Universal Service Alliance is a project of the Alliance for Technology Access, located in San Rafael, California. It is an alliance consisting of diverse organizations and community leaders serving low income, disabled, elderly and rural consumers throughout California. USA includes the following organizations and individuals: Access to Software for All People, Advocates for Consumer Equity, Alliance for Technology Access, California Association of Nonprofits, California Latino Civil Rights Network, California Small Business Association, Center for Accessible Technology, Children's Collective, Inc., Computer Access Center, Consumers Coalition of California, Consumers First, Digital Queers, Electronic Frontier Foundation, FAME Renaissance, Korean Youth Center, Los Angeles Urban League, MAAC Project, Radio Bilingue San Diego Urban League, Support Center for Nonprofit Management, World Institute on Disability, Francois Bar (Professor, Department of Communications, Stanford University), Dr. W. Elliot Brownlee (Professor, Department of History, UC Santa Barbara), Cheri Bryant (ACLU, Northern California), Matt Coles (ACLU Lesbian & Gay Rights Project), Susan Estrada (Aldea Communications, Inc.), J Craig Fong (Attorney & Community Advocate), Clyde Hostetter (Faculty Emeritus, CA Polytechnic State University, San Luis Obispo), Dr. Marvalene Hughes (President, California State University, Stanislaus), Linda Hamilton Krieger (Professor, Boalt Law School, UC Berkeley), Ibrahim Naeem (Coalition for a Nonviolent City), Helen Nelson (Consumer Research Foundation), Barbara O'Connor (Professor, Communications Studies, CA State University, Sacramento), Jennifer C. Pizer (Lambda Legal Defense & Education Fund), Toby Rothschild (Legal Aid Foundation of Long Beach), Peggy Saika (Asian Pacific Environment Network) and Linda Wong (Rebuild LA). Please note that the

implement Section 706 of the Telecommunications Act of 1996. When Congress enacted the Telecommunications Act of 1996, it recognized that high speed, broadband communications is essential not just for global financial firms and high technology companies but for individuals, community based organizations, small businesses, schools, libraries and public services agencies in all areas of the country including low income neighborhoods and rural areas.

Section 706 requires the Commission to “encourage the deployment on a reasonable and timely basis of advanced telecommunications capability to all Americans” through various means including removing barriers to infrastructure investment. Section 706(a). Section 706 further requires that the Commission determine whether such capability is being deployed to all Americans in a reasonable and timely fashion. If advanced capability is not being so deployed, the Commission must “take immediate action to accelerate deployment of such capability by removing barriers to infrastructure investment and by promoting competition in the telecommunications market.” Section 706(b).

Since 1996, the explosion in Internet applications has made it even clearer that access to jobs, commerce, and education in our society increasingly depend upon access to advanced telecommunications capability. It also has become increasingly clear that there is a “digital divide” in our society where a substantial number of Americans are unconnected to the Information Age. A recent study by the National Telecommunications and Information Administration entitled ***Falling***

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institutions and organizations following each individual are for identification purposes only.

***Falling Through the Net II*** finds that while there has been a significant growth in computer ownership and usage overall,

[T]he growth has occurred to a greater extent within some income levels, demographic groups, and geographic areas than in others. In fact, ***the digital divide between certain groups of Americans has increased between 1994 and 1997 so that there is now an even greater disparity in penetration levels among some groups.*** There is a widening gap, for example, between those at the upper and lower income levels. Additionally, even though all racial groups now own more computers than they did in 1994, Blacks and Hispanics now lag even further behind Whites in their levels of PC-ownership and on-line access.<sup>2</sup>

In view of the growing “digital divide” in our society, USA urges the Commission to fully and aggressively implement Section 706.

**I. The Commission Should Not Rely on Market Forces Alone to Ensure Deployment of Advanced Capabilities to All Americans.**

The purpose of Section 706 is to ensure that advanced telecommunications capability is broadly deployed so that all Americans have access to these capabilities in a reasonable and timely manner. Based on broad experience in other markets and current practices and behavior by telecommunications providers, the Commission should not rely on market forces alone to meet this important public policy objective.

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<sup>2</sup> See *Falling Through the Net II: New Data on the Digital Divide*, National Telecommunications and Information Administration, at <http://www.ntia.doc.gov/ntiahome/net2/falling.html> (*emphasis added*).

Competitive markets are remarkable mechanisms. They can offer consumers broad choices in products and services, lower prices and greater efficiency. However, competitive markets do not serve all consumers well. Markets allocate goods and services based on a consumer's ability to pay and tend to increase prices and provide poorer service to consumers who have little economic power. A number of studies have documented how low income consumers are not served by the markets for health care and health insurance<sup>3</sup>, automobile insurance<sup>4</sup>, banking and credit services<sup>5</sup> as well as housing, food, and other basic products and services.<sup>6</sup>

The same economic forces are at work in the deployment of advanced telecommunications capabilities. In California, where the California Public

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<sup>3</sup> See for example Nancy E. Adler, et al., "Socioeconomic Inequalities in Health: No Easy Solutions," 269 *J.Am.Med.Assn.* 3140 (1993), Helen R. Burstin, et al., "Socioeconomic Status and Risk for Substandard Medical Care," 268 *J.Am.Med.Assn.* 2383 (1992) Randall R. Bovbjerg and William G. Kopit, "Coverage and Care for the Medically Indigent: Public and Private Options," 19 *Ind.L.Rev.* 857 (1986). Eli Ginzeberg, *Parallels, Differences and Prospects in Changing U.S. Health Care: A Study of Four Metropolitan Areas*, Westview Press: Boulder, CO (1992) (finding a ten-fold or greater differential in the proportion of physicians to population between more affluent areas and low-income minority neighborhoods.)

<sup>4</sup> Jay D. Schultz, "An Analysis of Agent Location and Homeowners Insurance Availability, *Journal of Insurance Regulation*," Fall 1995, pp. 65-89 (based on correlation and regression analysis finds that placement of insurance agents and agencies is correlated with racial composition and income); Gary Williams, "The Wrong Side of the Tracks": Territorial Rating and the Setting of Automobile Liability Insurance Rates in California," 19 *Hastings Const. L.Q.* 845 (1992).

<sup>5</sup> See for example, "Two-Tiered Banking System Found: Report on Check-Cashing Industry Shows Inequities, Authors Say," *Milwaukee Journal Sentinel*, April 18, 1997, p. 1. ("A new report on Milwaukee's check-cashing industry says that despite a recent increase in bank activity in the central city, a "two-tiered banking system" has been created with one set of institutions for the poor and another for the middle class.")

<sup>6</sup> David Dante Troutt, *The Thin Red Line: How the Poor Still Pay More*, Consumers Union, 1993.

Utilities Commission opened the local exchange market to competition well before the enactment of the Telecommunications Act of 1996, Competitive Local Exchange Carriers (CLECs) are not deploying advanced networks to serve all Californians. Of the 127 CLECs certificated to date, only a few (e.g., PAC-WEST in the Central Valley and MFS in San Francisco) are actually constructing new network facilities and those facilities are being ***selectively*** deployed to serve high-end customers in downtown financial districts and high tech centers like Silicon Valley. A recent article in the *San Francisco Examiner* describes the current situation as follows:

The acronym CLEC may be a bit of a misnomer since most of these companies aren't marketing traditional local phone service but rather focusing on selling data transmission capacity. Only about 250,000 of California's 22 million local phone lines are serviced by CLECs, said Jack Leutza, director of the state PUC's telecommunications division.

"The CLECs' networks are all in and around key business districts," said Ron Cowles, another Dataquest analyst. "Those are the big data users. ***They're going after the cream of the crop.*** If you look at San Francisco, the CLEC's probably have about 15 percent of the business market." That's because profit margins are much higher in the business market, analysts said.<sup>7</sup>

Selective deployment of advanced network facilities is at the core of an overall strategy by telecommunications companies to focus on high-end customers. This strategy is exemplified by WorldCom which announced a \$30

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<sup>7</sup> Wendy Tanaka, Local Exchange Carriers Click: A New Breed of Telecommunications Firm is Competing Against Local Monopolies for Share of the \$70 Billion Small and Mid Size Business Phone Market, *San Francisco Examiner*, August 23, 1998 (*emphasis added*).

billion bid for MCI on October 1, 1997. Recently, one WorldCom official characterized the company as having a "religious focus" on the business customer and suggested that in view of this narrow focus WorldCom would consider turning over MCI's residential customers to other long distance companies after the merger.<sup>8</sup>

Other companies are following similar strategies. In September 1997, the *Wall Street Journal* reported that AT&T Vice Chairman John Zeglis had developed "... a refined strategy in which AT&T aims to focus much of its future marketing on the top tier of high spending customers of communications services." These customers are "the top 20 percent of people who account for 80 percent of the company's \$6 billion in annual profit and who use everything from cell phones to internet services."<sup>9</sup>

This focus on high-end customers means fewer choices, higher rates and no advanced networks for medium to low volume residential customers. According to WorldCom Chairman and CEO Bernard Ebbers, "[N]ot AT&T, not MFS or anyone else, is going to build local telephone facilities to residential customers. Nobody ever will, in my opinion."<sup>10</sup>

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<sup>8</sup> M. Mills, WorldCom Clarifies MCI Plans, *Washington Post*, October 4, 1997, D1. Subsequently, WorldCom has tried to reassure policymakers that it will not "abandon MCI's residential customers" but has not elaborated on its plans for the residential business.

<sup>9</sup> John J. Keller, AT&T Sets Bold New Business Strategy, *Wall Street Journal*, September 18, 1997. A-3.

<sup>10</sup> M. Mills, Hanging Up on Competition?, *Washington Post*, June 1, 1997, H-1.

## **II. The Commission Should Take Immediate Steps to Accelerate the Deployment of Advanced Telecommunications Capability.**

Under these circumstances, Section 706 requires the Commission to “take immediate action to accelerate [the deployment of advanced telecommunications capability] by removing the barriers to infrastructure investment and by promoting competition in the telecommunications market.” To this end, the Commission should support efforts at the state and local level to encourage the deployment of advanced telecommunications capabilities and services to low income, rural and other traditionally underserved communities.

### **A. Community Partnership Agreements.**

In 1997, Pacific Telesis Group merged with SBC Communications. One of the results of the merger is a broadbased Community Partnership Agreement (CPA) in which Pacific Telesis, SBC and nine groups and coalitions (including USA) representing 134 organizations and individuals entered into a partnership the aim of which is to “meet the needs of California’s underserved communities for full and equal access to basic and advanced telecommunications services, and to meet underserved communities’ needs for information carried by those services.”<sup>11</sup> Among other things, the CPA calls for an unprecedented goal of 98 percent telephone penetration rate in California and establishes a \$50 million Technology Fund which will “focus on advancing universal service in underserved communities and providing underserved communities with access

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<sup>11</sup> See Community Partnership Agreement Organizational Charter at p. 2.

to and education about emerging and advanced telecommunications.”<sup>12</sup> The California Public Utilities Commission gave preliminary approval to the CPA on March 31, 1998 and final approval on July 23, 1998.<sup>13</sup>

### **B. Broad Deployment of ADSL Technology.**

In addition, at the urging of USA and other signatories to the CPA, Pacific Bell recently agreed to broadly deploy Asymmetric Digital Subscriber Line (ADSL) technology in more than 200 communities across California communities including traditionally underserved communities such as East Palo Alto, South Central Los Angeles, Watts, Hunters Point, Oakland, Compton, and San Francisco’s Mission District.<sup>14</sup> Pacific Bell recently announced that it has deployed ADSL in 180 of these communities.

In its NOI, the Commission specifically requests comment on the effect of mergers and other consolidations on the deployment of advanced telecommunications capability. In particular, the Commission asks “Will they speed or slow the development by the merged companies and their competitors?

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<sup>12</sup> The CPA defines “underserved communities as “low-income, inner-city, minority, disabled, and limited-English-speaking communities and low-income seniors throughout the various geographic (urban and rural) regions of California.” CPA at p. 2.

<sup>13</sup> Re Pacific Telesis Group, Joint applicant: SBC Communications, Inc., Decision No. 97-03-067, Application No. 96-04-038, 1997 Cal. PUC LEXIS 629; 177 P.U.R.4th 462, March 31, 1997 *rehearing denied* 1997 Cal. PUC LEXIS 1023, November 5, 1997 and Resolution T-16172, Public Advocates, On Behalf of the Pacific Telesis/SBC Merger Signatory Coalitions, Submits an Organizational Charter Implementing the Community Partnership Commitment, July 23, 1998.

<sup>14</sup> See Pacific Bell, News Release, SBC Communications Announces Broad ADSL Deployment Across California, May 27, 1998 and Pacific Bell News Release, Pacific Bell’s ADSL-Internet Access Packages Now Available in 180 California Communities, September 1, 1998.

Will the net effect on advanced services be more or fewer choices, and lower or higher prices, for American consumers?" NOI at para. 24.

To date, the merger of SBC and Pacific Telesis has been a positive factor in terms of broad deployment of advanced telecommunications capability in California. The Community Partnership Agreement and \$50 million Technology Fund, of course, are direct results of the merger. We also believe that the assets of the combined company have made it possible for Pacific Bell to invest in a broad deployment of ADSL.

The CPA and broad deployment of ADSL technology are good first steps in promoting access for underserved communities in California. The CPA provides an organizational structure and financial resources to begin to promote the development of applications and demand in underserved communities. The broad deployment of ADSL complements the CPA by providing the infrastructure necessary for these applications.

Still, much more needs to be done. In particular, the resources in the Technology Fund need to be leveraged and multiplied many times over for the CPA to fully achieve its objectives. It also remains to be seen whether the current limitations of ADSL technology can be overcome and whether ADSL service can be priced at levels so that this capability will be available and affordable to schools, libraries, community based organizations, public service agencies, small businesses, and individuals in low income and rural communities.<sup>15</sup>

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<sup>15</sup> Currently, to receive ADSL service customers must be within 16,000 feet of an ADSL-equipped central office and their lines must meet certain transmission criteria. Pacific

### **C. Technology Diffusion Programs.**

Commissions in other states have also recognized the need to implement special measures to ensure that all customers have access to advanced services. The New York Public Service Commission (NYPSC) approved a plan by New York Telephone Company to fund a \$50 million Diffusion Program “to bring advanced telecommunications services to areas of the State that would not soon receive those services if deployment were driven exclusively by the market.”<sup>16</sup> In so doing, the NYPSC found that the program was not discriminatory and did not constitute an improper charitable contribution. The NYPSC also rejected the argument that the program gave New York Telephone an unfair competitive advantage. It stated:

The Plan simply ensure, as part of the overall regulatory plan for New York Telephone, that the company will use some of its resources to bring advanced telecommunications services to areas which the market along might not bring them. It affords the company no unfair competitive advantage, for competitors wishing to support similar infrastructure improvements are free to do so.<sup>17</sup>

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Bell estimates that given these limitations ADSL service will be available to approximately 60 percent of the households and businesses in each service area. For a single workstation home or office user, ADSL service from Pacific Bell costs about \$299 in initial, start-up expenses and \$89 per month.

<sup>16</sup> Proceedings on the Motion of the Commission to Investigate Performance Based-Incentive Regulatory Plans for New York Telephone Company – Track 2, Opinion No. 95-13, August 16, 1995, 1995 NY PUC Lexis 440.

<sup>17</sup> 1995 NY PSC LEXIS 440, \*182.

Similarly, the Ohio Public Utilities Commission (OPUC) approved a plan requiring Ameritech to provide \$2.2 million to establish 14 community computing centers bringing together hardware, software, network access and training.<sup>18</sup> The OPUC required that the computer centers be located in low income neighborhoods, open during after school hours and otherwise accessible to the communities that will be serving. The plan also required that Ameritech contribute \$18 million to a fund to assist schools in deploying distance learning technologies. Administered by the State Superintendent of Public Instruction, the fund would award grants to schools for the purchase of equipment, network usage and expenses associated with advanced telecommunications services such as advanced video with priority to low wealth school districts and those with a significant number of students from low income families.

Like the NYPSC, the OPUC rejected the argument that the Ameritech Plan was anticompetitive. Noting that there was nothing in the Plan, which prohibited competitors from committing their funds to similar projects, the Ohio Commission invited cable operators and other competitors to make similar commitments.

The Commission should support efforts like these and expand upon them whenever possible. For example, the Commission should condition future approvals of proposed mergers and acquisitions on a commitment to broad deployment of advanced capability, creation of a CPA mechanism, or other

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<sup>18</sup> In the Matter of the Application of the Ohio Bell Telephone Company for Approval of an Alternative Form of Regulation and In the Matter of the Complaint of the Consumer Counsel v. Ohio Bell Telephone Company, November 23, 1994, 1994 Ohio PUC LEXIS 956, *affirmed* 1995 Ohio PUC LEXIS 66.

specific measures to promote broad deployment to underserved communities. To date, these conditions have been imposed on Incumbent Local Exchange Carriers (ILECs) but not Competitive Local Exchange Carriers (CLECs) or Inter-Exchange Carriers (IECs). For instance, in California, while the California Public Utilities Commission directed that the mechanisms in the CPA be established as part of the SBC-Pacific Telesis merger, the California Commission imposed no such conditions in approving either the AT&T-Teleport merger or the WorldCom-MCI merger.<sup>19</sup> More providers need to participate in deploying advanced capabilities to underserved communities. These conditions should extend to all telecommunications carriers whether they are ILECs, CLECs, or IECs and without regard to their Dominant or Non-Dominant status.

The Commission should also seek to remove regulatory obstacles to programs that are designed to promote the deployment of advanced services to traditionally underserved markets. For example, the Commission should declare in advance that such programs are not anticompetitive or unfairly discriminatory and encourage state commissions to give prompt approval to such programs where such approval is necessary.<sup>20</sup>

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<sup>19</sup> In the Matter of the Joint Application of AT&T Corp. ("AT&T"), Teleport Communications Group Inc. ("TCG") and TA Merger Corp. for Approval Required For the Change in Control of TCG's California Subsidiaries That Will Occur Indirectly as a Result of the Merger of AT&T and TCG, Decision No. 98-05-022, Application No. 98-02-001 (Filed February 2, 1998), 1998 Cal. PUC LEXIS 533, May 7, 1998 and News Release, CPUC Approves MCI/WorldCom Merger, August 31, 1998 .

<sup>20</sup> The regulatory process can be an obstacle to these types of programs. For example, in California, the Education First Program was designed to provide ISDN service to schools, libraries and community college with free installation and service for one year and a flat Knowledge Network rate after the first year. As in the New York and Ohio cases cited above, competitors protested the Knowledge Network rate claiming that it

#### **D. Section 254 and Section 255.**

The Commission should also coordinate its implementation of Section 254 (Universal Service) and Section 255 (Access to Telecommunications Services, Telecommunications Equipment and Customer Premises Equipment by Persons with Disabilities) with its implementation of Section 706. These provisions are closely related and share a common goal of ensuring that all Americans have access to affordable basic and advanced telecommunications services.<sup>21</sup>

Under Section 254, the Commission should mandate that schools and libraries develop innovative ways of using supported services to bridge the gap, which often separates the school or library from its surrounding community. (For instance, in addition to Internet research and E-Mail oriented towards students and faculty, couldn't the same supported services be deployed to allow for greater communication between working parents and classroom teachers, for homework assistance, to support mentoring programs, to make it easier for students to volunteer in their community and other ways that would bring the

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was anticompetitive. The California Public Utilities Commission took over a year to consider the protests and found that the Knowledge Network rate was not anticompetitive. Resolution T-15837, Request to Establish Provision Tariff for Flat Rate Usage by Public Schools, Libraries, Colleges, Universities and Private Schools, February 7, 1996.

<sup>21</sup> Section 254 requires that universal service rules be based on the principle that "Access to advanced telecommunications and information services should be provided in all regions of the country" and "Consumers including low-income consumers and those in rural, insular, and high cost areas, should have access to telecommunications and information services, including ... advanced telecommunications and information services that are reasonably comparable to those services provided in urban areas ... ." Section 254(b)(2)(3). Like the Americans with Disabilities Act of 1990 on which it is based, the purpose of Section 255 is to "assure equality of opportunity, full participation,

school, home and community environments closer together?) The Commission should encourage the broader deployment of advanced services and capability by giving higher priority to schools and libraries that take steps to include the broader community in planning and deploying supported services.

The Commission should also seek legislation allowing community based organizations (CBOs) to be eligible for those discounts. Acting pursuant to state legislation, the California Public Utilities Commission has established a California Teleconnect Fund which makes discounts available to CBOs as well as schools, libraries and health care providers. In so doing, the CPUC stated:

The California Teleconnect Fund also reduces the dicotomy between the information rich and information poor. ... By providing qualifying CBOs with discounts for high speed data connections, these CBOs can better serve their constituencies, and provide the communities they serve with increased access to the telecommunications network, thereby decreasing the stratification between information rich and information poor communities.<sup>22</sup>

The Commission should also seek other ways of providing financial support for programs like the CPA which are intended to build and aggregate demand for advanced telecommunications capability in traditionally underserved communities through information, education and demonstration projects.

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independent living, and economic self-sufficiency: for individuals with disabilities." (42 U.S.C. Section 120101(a)(8).

<sup>22</sup> Rulemaking on the Commission's Own Motion into Universal Service and to Comply with the Mandates of Assembly Bill 3643; Investigation on the Commission's Own Motion into Universal Service and to Comply with the Mandates of Assembly Bill 3643, Decision No. 96-10-066, Rulemaking No. 95-01-020 (Filed January 24, 1995), Investigation No. 95-01-021 (Filed January 24, 1995), 1996 Cal. PUC LEXIS 1046 \*137, October 25, 1996.

Under Section 255, the Commission should also modify its proposal to exempt information services from the requirement that manufacturers of telecommunications equipment and providers of telecommunications services make their products and services accessible to persons with disabilities where readily achievable. If adopted, the Commission's proposal would exempt services such as voice mail, electronic mail, interactive voice response, gateways to online services and other services that hold the greatest promise for persons with disabilities. Contrary to the public policy goals of Section 254, 255 and 706, exempting information services from Section 255 would severely limit access by disabled customers to a narrow set of increasingly outdated telecommunications services.

The Commission should also be actively inquiring how greater bandwidth can be used to remove barriers for consumers with disabilities. For example, video conferencing allows for both sign language interpreting as well as TTY messaging among participants.<sup>23</sup> This capacity to communicate among hearing and non-hearing communicators makes broadband technology extremely important especially in light of Section 255's goal of removing communication barriers.

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<sup>23</sup> See "Breaking the Sound Barrier: Videophones Let the Deaf Communicate in Whole New Way," *San Francisco Chronicle*, June 9, 1998.

### **Conclusion**

For the reasons set forth above, USA urges the Commission to take immediate action to accelerate the deployment of advanced telecommunications capability to underserved communities.

Dated: September 14, 1998

Respectfully submitted,

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